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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

WAYMO LLC,

CASE NO. 3:17-cv-00939

Plaintiff,

15 vs.
16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO LLC; OTTO TRUCKING
LLC

PLAINTIFF WAYMO LLC'S LIST OF ORDERS AND ADMISSIONS [DKTS. 775 & 784]

Defendants

1 In accordance with the Court's Orders (Dkts. 775 & 784), Plaintiff Waymo LLC
2 ("Waymo") hereby submits this list of references to Court Orders and admissions in briefs,
3 admissions at hearings, and admissions (by counsel) at depositions, attached hereto as Appendix 1.
4 This list is submitted based on information currently available to Waymo, and Waymo reserves
5 the right to amend this list or supplement it as necessary based on further discovery and events in
6 this litigation. Each of the items in the list falls into one or more of the relevance categories below
7 (as indicated by letter in brackets in the list at Appendix A).

- 8 **A. Relevant to Defendants' possession, custody, or control of the downloaded
9 materials**
- 10 **B. Relevant to Defendants' knowledge that Waymo's trade secrets were acquired
11 through improper means and ratification of Mr. Levandowski's conduct**
- 12 **C. Relevant to Defendants' acquisition, disclosure, and/or use of Waymo's trade
13 secrets**
- 14 **D. Relevant to Waymo's damages and/or equitable relief**
- 15 **E. Relevant to establish the timing of Defendants' duty to preserve evidence**
- 16 **F. Relevant as rebuttal if Defendants open the door to efforts taken in response to
17 Court Orders**
- 18 **G. Relevant as rebuttal if Defendants open the door to the amount or types of
19 discovery from Defendants as showing alleged non-use of Waymo's trade
20 secrets**
- 21 **H. Relevant to show Defendants' inconsistent positions on important issues in the
22 case**

23 DATED: July 10, 2017

24 QUINN EMANUEL URQUHART & SULLIVAN,
25 LLP

26 By /s/ Charles K. Verhoeven

27 Charles K. Verhoeven
28 Attorneys for WAYMO LLC